



1 MICHAEL P. LOWRY, ESQ.
2 Nevada Bar No. 10666
3 E-mail: Michael.Lowry@wilsonelser.com
4 JONATHAN C PATTILLO, ESQ.
5 Nevada Bar No. 13929
6 E-mail: Jonathan.Pattillo@wilsonelser.com
7 6689 Las Vegas Boulevard South, Suite 200
Las Vegas, NV 89119
Tel: 702.727.1400/Fax: 702.727.1401
7 Attorneys for Cardenas Markets, LLC; Lamanza, LLC

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
11 Monica E. Ramirez Hernandez,

Case No.: 2:23-CV-799

12 Plaintiff,

13 vs.

14 Cardenas Markets, LLC; Lamanza, LLC; Doe Store
15 Managers I through X; Doe Store Employees I
through X; Doe Owners 1 through X; Doe Property
Managers I through X; Doe Maintenance Employees
I through X; Doe Janitorial Employees I through X;
Roe Property Managers XI through XX; Roe
Maintenance Companies XI through XX; Roe
Owners XI through XX; Roe Employees XI through
XX; Does XXI through XXXC; Roe Corporations
XXC through XXX, inclusive, jointly and severally,

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17 Defendant.

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**Amended Proposed Stipulated
Discovery Plan and Scheduling Order;
Submitted in Compliance with LR 26-
1(b)**

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**SPECIAL SCHEDULING REVIEW
REQUESTED**

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1. **Meeting:** The parties conducted the Rule 26(f) conference on June 1, 2023.
2. **Pre-Discovery Disclosures:** The parties have not yet served their Rule 26(a)(1) disclosures.
3. **Discovery Plan:** The parties propose the discovery period below, calculated from Cardenas
Markets, LLC and Lamanza, LLC's May 22, 2023 Petition for Removal. The parties request
additional time because of the nature of Plaintiff's injuries. Plaintiff alleges a number of
injuries for her lower and upper back. She is still treating, receiving pain management and

1 chiropractic care. Plaintiff may allege the need for surgery. Thus the parties request an
 2 additional 90 days.

3 Amending the Pleadings and Adding Parties	November 17, 2023
4 Initial Expert Disclosures & Interim Status Report	November 17, 2023
5 Rebuttal Expert Disclosures	December 15, 2023
6 Discovery Closes	February 16, 2024
7 Dispositive Motions	March 15, 2024
8 Pre-Trial Order, if no Dispositive Motions	April 12, 2024

10 The parties certify that they have conferred about the possibility of using alternative dispute
 11 resolution processes, but concluded they are not mutually beneficial at this time. The parties also
 12 considered consent to trial by a magistrate judge and the use of the Short Trial Program. Further,
 13 the parties have discussed electronic evidence, but to date have no electronic evidence to present
 14 other than video of the fall.

16  WILSON ELSER WILSON ELSER MOSKOWITZ FOLEMAN & DICKER LLP	17 BIGHORN LAW
17 <i>/s/ Jonathan C. Pattillo</i> Michael P. Lowry, Esq. Nevada Bar No. 10666 Jonathan C. Pattillo, Esq. Nevada Bar No. 13929 Attorneys for Cardenas Markets, Inc.; Lamanza, LLC	18 <i>/s/ Joshua P. Berrett</i> Kimball Jones, Esq. Nevada Bar No. 12982 Joshua P. Berrett, Esq. Nevada Bar No. 12697 Attorneys for Monica Ramirez Hernandez

23 **ORDER**

24 **IT IS SO ORDERED.**
 25 DATED: June 5, 2023

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27 **UNITED STATES MAGISTRATE JUDGE**

Certificate of Service

Pursuant to NRCP 5, I certify that on June 2, 2023, I served **De Proposed Stipulated Discovery Plan and Scheduling Order; Submitted in Compliance with LR 26-1(b)** as follows:

- by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Bighorn Law
3675 W. Cheyenne Ave. Suite 100
North Las Vegas, NV 89032
Attorneys for Plaintiff

BY: *Mary Ann Tuer*
An Employee of Wilson Elser Moskowitz Edelman
& Dicker, LLP